

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
UNITED STATES OF AMERICA)	
)	
v.)	
)	CRIMINAL NO. 19-cr-10335-DJC
TANMAYA KABRA,)	
Defendant.)	
)	
_____)	

JOINT INTERIM STATUS REPORT

Pursuant to Local Rule 116.5(b), the parties hereby file the following joint interim status report prepared in connection with the interim status conference scheduled for January 9, 2020.

1) Automatic Discovery/Pending Discovery Requests

The Government provided automatic discovery to the defendant on October 11 and October 17, 2019 and provided supplemental discovery on October 24, November 18, December 11, and December 27, 2019.

2) Additional Discovery

The Government anticipates receiving further productions of documents in this case and anticipates it will provide additional discovery when it receives these productions.

3) Timing of Additional Discovery Requests

Defendant is reviewing discovery and, at this time, is reserving the need for further discovery requests.

4) Protective Orders

The Court has entered a protective order in this matter. *See* Doc. No. 55.

5) Pretrial Motions

The defendant has not filed any pretrial motions under Fed. R. Crim. P. 12(b). He reserves the right to file such a motion or motions after additional review of the discovery.

6) Expert Discovery

The Government agrees to provide any expert witness disclosures 45 days prior to trial. The Defendant agrees to provide any expert witness disclosures 30 days prior to trial.

7) Defenses of Insanity, Public Authority, or Alibi

The defendant does not presently intend to assert a defense of insanity, public authority, or alibi.

8) Speedy Trial Act

The time from the date of the arraignment through September 27, 2019 is automatically excludable because of the then-pendency of the Defendant's Motion to Revoke Detention Order and for Pretrial Release. *See* 18 U.S.C. §§ 3161(h)(1)(D), (H). All of the time has been excluded from September 27, 2019 through January 9, 2020.

The parties request that the time be excluded from January 9, 2020 until the next scheduled status conference.

9) Status of Plea Discussions and Likelihood of Trial

The parties have not discussed a plea disposition. The parties estimate that a trial in this matter would last five weeks.

10) Next Status Conference

Given the foregoing, and in light of the significant volume of discovery that has recently been produced by the Government, the parties request that the interim conference scheduled for January 9, 2020 be cancelled and a further interim status conference be scheduled in approximately 45 days.

Respectfully submitted,

<p>TANMAYA KABRA,</p> <p>By his attorneys,</p> <p><u>/s/ Mark A. Berthiaume</u></p> <p>Mark A. Berthiaume Angela Bunnell Greenberg Traurig One International Place, Suite 2000 Boston, MA 02110 617.310.6007</p>	<p>UNITED STATES OF AMERICA,</p> <p>By its attorney,</p> <p>ANDREW E. LELLING United States Attorney</p> <p><u>/s/ Chris Looney</u></p> <p>Christopher Looney Assistant United States Attorney 408 Atlantic Avenue, Suite 530 Boston, MA 02210 (617) 748-3287</p>
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Dated: January 2, 2020

CERTIFICATE OF SERVICE

Undersigned counsel certifies that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

/s/ Chris Looney
Christopher Looney
Assistant United States Attorney

Dated: January 2, 2020